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14 Attorneys for Plaintiff  
15 NETWORK CACHING TECHNOLOGY, L.L.C.

16 UNITED STATES DISTRICT COURT  
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18 NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

16 NETWORK CACHING  
17 TECHNOLOGY, L.L.C.,

18 Plaintiff,

19 v.

20 NOVELL, INC., VOLERA, INC.,  
21 AKAMAI TECHNOLOGIES, INC.,  
22 CACHEFLOW INC., AND INKTOMI  
23 CORPORATION,

24 Defendants.

Case No. CV-01-2079 (VRW)

DECLARATION OF LAURA T. GEYER IN  
SUPPORT OF PLAINTIFF NETWORK  
CACHING TECHNOLOGY, L.L.C.'S  
MEMORANDUM IN OPPOSITION TO  
DEFENDANT INKTOMI  
CORPORATION'S MOTION TO STRIKE  
PLAINTIFF'S SECOND REVISED  
PRELIMINARY INFRINGEMENT  
CONTENTIONS

Date: June 27, 2002  
Time: 2:00 pm  
Judge: Honorable Vaughn R. Walker  
Place: Courtroom 6, 17<sup>th</sup> Floor

1 I, Laura T. Geyer, declare as follows:

2 1. I am an attorney with the law firm of Jones, Day, Reavis & Pogue, counsel for  
3 plaintiff Network Caching Technology, L.L.C. ("NCT"). I have personal knowledge of the facts  
4 set forth in this declaration and could and would competently testify thereto under oath if called  
5 as a witness.

6 2. Attached hereto as **Exhibit A** is a true and correct copy of two letters from Blaney  
7 Harper to Monte M.F. Cooper dated April 9, 2002.

8 3. Attached hereto as **Exhibit B** is a chart summarizing the patents, claims, and  
9 Accused Products named in NCT's Second Revised Preliminary Infringement Contentions.

10 4. Attached hereto as **Exhibit C** is a true and correct copy of portions of NCT's  
11 Second Revised Preliminary Infringement Contentions Appendix E-3 ("Accused Inktomi  
12 Product: Traffic Server E-Class") that was served by NCT on April 15, 2002.

13 5. Attached hereto as **Exhibit D** is a true and correct copy of documents bates  
14 numbered INK 8097-8104 and INK 8083-8086 that were cited by NCT in Appendix E-3 of its  
15 Second Revised Preliminary Infringement Contentions.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of the District Court  
17 opinion in *View Engineering, Inc. v. Robotic Vision Systems, Inc.* granting sanctions on six of the  
18 eight patents at issue, (No. CV-95-1882 (C.D. Cal. June 24, 1996)), which was affirmed by the  
19 Court of Appeals for the Federal Circuit in *View Engineering, Inc. v. Robotic Vision Systems,*  
20 *Inc.*, 208 F.3d 981 (Fed. Cir. 2000).

21 7. Attached hereto as **Exhibit F** is a true and correct copy of the Declaration of Roger  
22 S. Thompson, cited by the Court of Appeals for the Federal Circuit in the case of *View*  
23 *Engineering, Inc. v. Robotic Vision Systems, Inc.*, 208 F.3d 981 (Fed. Cir. 2000).

24 8. Attached hereto as **Exhibit G** is a true and correct copy of a declaration by John C.  
25 Mitchell, Professor of Computer Science at Stanford University, prepared June 5, 2002.

26 9. Attached hereto as **Exhibit H** is a true and correct copy of the transcript from the  
27 March 15, 2002 hearing before Judge Walker.  
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1 Executed this 6th day of June, 2002, in Washington, District of Columbia.

2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4  
5 /s/ Laura T. Geyer

6 Laura T. Geyer  
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